

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

VS.

MOZILLA CORPORATION, a.k.a. M.F. Technologies, a California corporation ; MOZILLA FOUNDATION, a California public benefit corporation; LAURA CHAMBERS and her marital community; WINIFRED MITCHELL BAKER and her marital community; and DANI CHEHAK and her marital community;

Defendants.

Case No. 2:24-CV-01032-RAJ

**DEFENDANT MOZILLA
FOUNDATION'S NOTICE OF JOINDER
IN DEFENDANTS MOZILLA
CORPORATION, ET AL.'S MOTION TO
CONTINUE TRIAL DATE AND AMEND
CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:
MAY 16, 2025**

Defendant Mozilla Foundation (“the Foundation”), by and through its undersigned counsel, joins Defendants Mozilla Corporation, Laura Chambers, and Dani Chehak’s (“the Corporation”) Motion to Continue Trial Date and Amend Case Schedule, filed on April 25, 2025. Dkt. # 40. The Foundation incorporates by reference all of the arguments contained therein.

In addition to the reasons offered by the Corporation, the Foundation highlights that thousands of pages of discovery documents were produced in the last two weeks with additional discovery documents both anticipated and subject to pending motions. The current deposition schedule is unworkable and unrealistic given the likelihood of the last-minute production of necessary documents, which will result in prejudice to the parties in preparing for depositions and summary judgment. For these reasons, and the reasons stated in the Corporation's Motion and

1 Defendant Winifred Mitchell Baker's Notice of Joinder, Dkt. # 43, the Foundation respectfully
2 requests that the Court grant the Motion to Continue Trial Date and Amend Case Schedule.

3 DATED this 1st day of May, 2025.

4 SEBRIS BUSTO JAMES

5 /s/ Darren Feider

6 Darren A. Feider, WSBA #22430

7 Beth Touschner, WSBA #41062

8 15375 Southeast 30th Place, Suite 310

9 Bellevue, Washington 98007

10 (425) 454-4233

11 dfeider@sbj.law

12 btouschner@sbj.law

13 Attorneys for Defendant Mozilla Foundation

14 I certify that this memorandum contains 160
15 words, in compliance with the Local Civil
16 Rules.

CERTIFICATE OF SERVICE

I, Darren A. Feider, certify under penalty of perjury under the laws of the United States and the State of Washington that, on May 1, 2025, I caused to be served the attached document to the individual listed below in the manner shown next to his name:

Attorneys for Plaintiff:

Mathew L. Harrington
Amy K. Alexander
Maricarmen Perez-Vargas
STOKES LAWRENCE, P.S.
1420 5th Avenue, 30th Floor
Seattle, WA 98101

Mathew.Harrington@stokeslaw.com
Amy.Alexander@stokeslaw.com
Maricarmen.Perez-Vargas@stokeslaw.com

- By U.S. Mail
- By Federal Express
- By Facsimile
- By ABC Messenger
- By Electronic Mail
- By E-service

Attorneys for Defendants Mozilla Corporation, Laura Chambers, Winifred Mitchell Baker, and Dani Chehak:

Anthony Todaro
Alexandria Cates
DLA PIPER LLP (US)
701 Fifth Avenue, Suite 6900
Seattle, WA 98104-7029
Anthony.todaro@us.dlapiper.com
Alexandria.cates@us.dlapiper.com

- By U.S. Mail
- By Federal Express
- By Facsimile
- By ABC Messenger
- By Electronic Mail
- By E-service

Attorneys for Defendant Winifred Mitchell
Baker

Dan Weiskopf
Rick Redmond
MCNAUL EBEL NAWROT & HELGREN
PLLC
600 University Street, Suite 2700
Seattle, WA 98101
dweiskopf@mcnaul.com
Redmond@mcnaul.com

- By U.S. Mail
- By Federal Express
- By Facsimile
- By ABC Messenger
- By Electronic Mail
- By E-service

/s/Darren A. Feider
Darren A. Feider